

E FILED ON 09/23/2020
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

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In re:)	BANKRUPTCY NUMBER:
)	BK-S-20-12890-MKN
PLAYERS NETWORK,)	Chapter 11
)	
Debtor.)	Date: October 7, 2020
)	Time: 9:30 a.m.

**OPPOSITION CONVERTIBLE NOTE HOLDER, SBI INVESTMENTS LLC, 2014-1'S
MOTION TO DISMISS DEBTOR'S CHAPTER 11 CASE FOR CAUSE UNDER 11 U.S.C.
§§305(A)(1), 1112(b), & 1129(A)(3)**

Comes now, Debtor above-named, by and through its attorney THOMAS E. CROWE, ESQ., and oppose the Opposition to Convertible Note Holder, SBI Investments, LLC, 2014-1's Motion to Dismiss Debtor's Chapter 11 Case For Cause Under 11 U.S.C. §§305(A)(1), 1112(b), & 1129 (A)(3), filed by Brian D. Shapiro, Esq., Attorney for SBI Investments, LLC, 2014-1, based upon the points and authorities attached hereto.

DATED this 23rd day of September, 2020.

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

By/s/THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
2830 S. Jones Blvd., Suite 3
Las Vegas, Nevada 89146
Attorney for Debtor

POINTS AND AUTHORITIES

The aforementioned Debtor filed for relief under Chapter 11 of Title 11 of the Bankruptcy Code on June 17, 2020. The Debtor herein opposes the Convertible Note Holder, SBI Investments LLC, 2014-1's Motion to Dismiss Debtor's Chapter 11 Case For Cause Under 11 U.S.C. §§305(A)(1), 1112(b), & 1129(A)(3) filed herein by Brian D. Shapiro, Attorney for SBI Investments, LLC, 2014-1, on the basis that Debtor's Plan does not attempt to modify the rights of convertible debt holders to convert. Thus convertible debt holders, to the extent they are treated as shareholders, remain unimpaired as shareholders. The only impairment under the Plan would be to unsecured creditors (such as SBI) and Debtor anticipates that the sole class of creditors will accept the Plan, thus negating the effect of the absolute priority rule.

SBI's argument is also disingenuous because the court has already lifted the stay to allow conversion pending approval of Debtor's Plan. It is clear that no impairment whatsoever results from the Bankruptcy to the shareholders who received their shares via conversion.

Debtor furthermore is not currently deriving revenue from any business activity which may be in violation of 21 U.S.C. §843(a)(7). While its subsidiary is designed to engage in such activities upon anticipated legalization, the Debtor itself is neither operating nor planning to operate any such facility. Under controlling Ninth Circuit authority, Debtor itself is not engaged in any business activity

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which at this juncture could be deemed in violation of the Controlled Substance Act (CSA), nor is it deriving revenue or expected to derive tainted revenue from any related entity during the pendency of this Bankruptcy.

DATED this 23rd day of September, 2020.

Respectfully Submitted:

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

By/s/ THOMAS E CROWE
THOMAS E. CROWE, ESQ.
2830 S. Jones Blvd., Suite 3
Las Vegas, Nevada 89146
Attorney for Debtor

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**CERTIFICATE OF MAILING OF RE: OPPOSITION CONVERTIBLE NOTE HOLDER,
SBI INVESTMENTS LLC, 2014-1'S MOTION TO DISMISS DEBTOR'S CHAPTER 11
CASE FOR CAUSE UNDER 11 U.S.C. §§305(A)(1), 1112(b), & 1129(A)(3)**

I, DONOVAN BOSQUE hereby certify that a copy of the OPPOSITION CONVERTIBLE NOTE HOLDER, SBI INVESTMENTS LLC, 2014-1'S MOTION TO DISMISS DEBTOR'S CHAPTER 11 CASE FOR CAUSE UNDER 11 U.S.C. §§305(A)(1), 1112(b), & 1129(A)(3) filed herein, in the above-entitled case, was mailed via U.S. Mail or electronically mailed by the court on the 23rd day of September, 2020, to the parties and addresses follows:

Brian Shapiro
510 S. 8th St., Suite 305
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brian@brianshapirolaw.com

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Ivan J. Reich
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DATED this 23rd day of September 2020.

/s/ DONOVAN BOSQUE
DONOVAN BOSQUE, an employee of
THOMAS E. CROWE PROFESSIONAL